

JOSEPH B. SALA, Ph.D.

1 A. I -- I haven't specified the
2 delineation between bolts or the rotating shaft.
3 I think that the testimony is that this rotating
4 shaft, that area, is an open and obvious hazard,
5 and that it was well understood among people with
6 similar training, experience and work-related
7 tasks that that was a hazard. That anything you
8 would provide on a warning was already a part of
9 their understanding of this aspect of the machine.

10 Q. What objective evidence do you have in
11 that record, in that file in front of you, that
12 Glen Coggins knew that?

13 A. That his training and his experience
14 was -- and his -- his work environment was
15 consistent with the -- his fellow coworkers in --
16 in Seaboard -- at Seaboard Foods.

17 Q. You're basing your thoughts on what
18 Glen Coggins should realize or recognize based on
19 what his coworkers realized and recognized, and
20 you just told me two minutes ago two people can
21 look at the same thing and perceive it
22 differently.

23 A. And I also --

24 MR. CONDREN: Object to the

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